



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

11/20/02
EPA Region 5 Records Ctr.



226777

REPLY TO THE ATTENTION OF

September 20, 2002

SE-5J

Mr. Richard Berggreen
STS Consultants
750 Corporate Woods Parkway
Vernon Hill, IL 60061

RE: Lakeshore East Revised Workplan

Dear Mr. Berggreen:

The U.S. Environmental Protection Agency (USEPA) has reviewed the revised Workplan for the Lakeshore East Development (Workplan) dated September 20, 2002. USEPA has the following comments:

- 1) **Page 4, Section 2.1, para. 2**—If contaminants are below groundwater and will be left, a water sample should be taken and some mechanism provided to identify for future encounters where the contaminants are.
- 2) **Page 4, Section 2.1, para. 4 and Section 2.3, para. 1**—If radiological monitoring begins 2 feet down some contaminant may be missed. This is because only 12 inches of soil will shield out 97% of the dose rate from buried contaminant. Monitoring should probably begin with the first 18 inch lift.
- 3) **Page 13, Section 3.3, Materials Management, last paragraph**: Change “In that is” to “If that is”.

With regard to the response to comments letter dated September 13, 2002, USEPA has the following comments:

Response 20: Section 4.2 in SOP-212 does not commit to an unobstructed path from the source to the sampler.

With a site this large 4 high volume air monitor measurements at the N, S, E, and W perimeters will not adequately determine the general public air concentrations. There will be large gaps in the sampling zones. Consideration must be given to tightening the sampling perimeter. If a smaller perimeter was used it would not have to be fixed but could be moved as the excavation activities proceed. Air monitoring spacings used at the River East or North McClurg Sites would be sufficient.

In addition, the order of excavation should be stated in the workplan, i.e. will work start near the north or south, etc. Somewhere, this should be stated so that proper dust control measures can be arranged.

Response 22: Section 2 in SOP-212 references 32 IAC 340.320 when the citation should be to 10 CFR 20 unless 32 IAC is more restrictive.

Response 41: The radium-226 and radium-228 guidelines in Regulatory Guide 1.86 are 20 dpm/100 cm². These are more restrictive than the IDNS 33 dpm/100 cm².

These modifications must be inserted in the final workplan.

In addition, this letter confirms the verbal authorization to mobilize given on September 19, 2002. The completed workplan must be submitted to USEPA and approved by USEPA before the actual commencement of removal activities.

If you have questions regarding this letter, please contact me, as soon as possible, at (312) 886-5123 or contact Verneta Simon, On-Scene Coordinator, at (312) 886-3601, or Larry Jensen, Senior Health Physicist at (312) 886-5026.

Sincerely,



Fredrick A. Micke, P.E.
On-Scene Coordinator
ERB Section #3

cc: Lakeshore East L.L.C.

bcc: Larry Jensen, SE-5J
Verneta Simon, SE-5J
Debbie Regel, SE-5J
Linda Nachowicz, SE-5J
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